



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/12/2024

THE CITY OF NEW YORK
LAW DEPARTMENT

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March 12, 2024

BY ECF

Honorable Colleen McMahon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Edwin Nunez v. City of New York, et al.
22-CV-9428 (CM)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing defendants City of New York, Vincent Schiraldi, Kenneth Stukes, Jean-Claude LeBec, Patricia Feeney, Ada Pressley, Nadene Pinnoch, Sharlisa Walker, Solomon Chester, and Nicholas Flagg (collectively "defendants") in the above-referenced matter. Defendants write to respectfully request that the Court refer the parties to mediation in this matter. Additionally, to the extent that Your Honor is inclined to so refer the parties, defendants request a stay of discovery until after the completion of mediation. Plaintiff and co-defendant, Enrique Alexander, consent to both requests.

The reason for these requests is that the parties would like to explore settlement before engaging in further time-consuming and costly discovery, including, but not limited to, conducting eleven party depositions. The parties have already begun engaging in settlement discussions and are hopeful that they will be able to bridge the gap with the assistance of a mediator.

Thank you for your consideration.

Respectfully submitted,

Seema Kassab /s/
SEEMA KASSAB, Esq.
Senior Counsel

Colleen McMahon
3/12/24

CC: Eugene M. Bellin (By ECF)
Attorney for Plaintiff

John Burns (By ECF)
Attorney for Co-Defendant